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16 Attorneys for Defendant
THE SALVATION ARMY

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

22 MONA YOUNIS,
23 Plaintiff,
24 v.
25 SALVATION ARMY, and
26 inclusive,
Defendant

Case No. 2:20-cv-00601-KJM-AC

**JOINT STIPULATION AND ORDER TO
STAY ALL PROCEEDINGS PENDING
RESOLUTION OF ARBITRATION**

Complaint Filed: October 31, 2019

STIPULATION

Plaintiff MONA YOUNIS (“Plaintiff”) and Defendant THE SALVATION ARMY (“Defendant”) (collectively, the “Parties”), by and through their undersigned counsel, hereby stipulate and agree to stay all proceedings pending resolution of arbitration, as follows:

WHEREAS, Plaintiff was hired for employment with Defendant on or about June 20, 2011;

WHEREAS, on or about February 18, 2015, Plaintiff entered into an arbitration agreement with Defendant wherein she agreed to submit any and all claims arising out of her employment relationship to binding arbitration (the “Arbitration Agreement”);

WHEREAS, on October 31, 2019, Plaintiff initiated a lawsuit against Defendant in the California Superior Court, County of Sacramento, by filing a complaint for damages (Case No. 34-2019-00267990); and

WHEREAS, Defendant removed this matter to this Court pursuant to federal question jurisdiction (28 U.S.C. § 1441(a));

WHEREAS, all parties have agreed to submit the claims pending in this matter to arbitration pursuant to the terms of the Arbitration Agreement;

WHEREAS, all parties have agreed that all proceedings in this matter should be stayed pending the resolution of arbitration.

THEREFORE, subject to the approval of this Court, it is hereby stipulated and agreed by and between the Parties as follows:

(1) Plaintiff shall submit the Instant Action to binding arbitration.

SO STIPULATED.

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1 Dated: March 26, 2020
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4 */s/ Robert P. Biegler (as approved on 3/26/20)*
5 ROBERT P. BIEGLER
THE BIEGLER LAW FIRM
6 Attorneys for Plaintiff
7 MONA YOUNIS
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10 Dated: March 26, 2020
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12

13 */s/ Nathaniel H. Jenkins* _____
14 JOSHUA Z. FELDMAN
15 NATHANIEL H. JENKINS
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17 Attorneys for Defendant
18 THE SALVATION ARMY
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ORDER

Having read and considered the parties' recitals and stipulation, as set forth above, and good cause appearing wherefore, the Court hereby orders as follows:

- 1) All proceedings in this lawsuit now pending before the United States District Court, Eastern District of California are immediately stayed pending the resolution of the Parties' arbitration.
 - 2) The Parties shall report to the court the outcome of arbitration and the implications for this action within fourteen (14) days of completion of the arbitration proceedings.

IT IS SO ORDERED.

DATED: April 6, 2020.

CHIEF UNITED STATES DISTRICT JUDGE